

REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY

Debtor John S. Von Helms, Case No 15-40961 Chapter 13
Moving Creditor Bayview Loan Servicing, LLC Date Case Filed December 2, 2015

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☒ Other (describe): Co-Debtor Stay/Dismiss

Chapter 13 Date of Confirmation Hearing Date Plan Confirmed June 10, 2016

1. Collateral
 - a. ☒ Home
 - b. ☐ Car _____
 - c. ☐ Other (describe) _____
2. Balance Owed as of July 7, 2020 \$255,261.09
Total of all other Liens against Collateral \$0.00 (per debtor's schedule)
3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the Debtor post-petition.
4. Estimated Value of Collateral (must be supplied in *all* cases) \$340,000.00 (per Debtor's Schedules)
5. Default
 - a. ☐ Pre-Petition Default
Number of months _____ Amount \$ _____
 - b. ☒ Post-Petition Default
 - i. ☒ On direct payments to the moving creditor
Number of months 3 Amount \$8,826.04 (including attorney's fees and costs)
 - ii. ☐ On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount \$ _____
6. Other Allegations
 - a. ☒ Lack of Adequate Protection § 362(d)(1)
 - i. ☐ No insurance
 - ii. ☐ Taxes unpaid Amount \$ _____
 - iii. ☐ Rapidly depreciating asset
 - iv. ☒ Other (describe) Material payment default
 - b. ☐ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
 - c. ☐ Other "Cause" § 362(d)(1)
 - i. ☐ Bad Faith (describe) _____
 - ii. ☐ Multiple Filings
 - iii. ☐ Other (describe) _____
 - d. Debtor's Statement of Intention regarding the Collateral
 - i. ☐ Reaffirm
 - ii. ☐ Redeem
 - iii. ☐ Surrender
 - iv. ☐ No Statement of Intention Filed

Date: July 30, 2020

Submitted By:

/s/Kinnera Bhoopal

ARDC# 6295897

McCalla Raymer Leibert Pierce, LLC